

MEMO ENDORSED



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September 11, 2019

VIA ECF

Hon. Ona T. Wang
United States District Court
Southern District of New York
500 Pearl Street, Courtroom 20D
New York, New York 10007

Re: Stinson v. Houslanger & Assoc., PLLC, et al., No. 1:18-cv-11350(JPO)(OTW)

Dear Magistrate Judge Wang:

We represent the defendants Houslanger & Associates, PLLC, Todd Houslanger, Matthew Blake and Bryan C. Bryks. Pursuant to Your Honor's Order, dated September 5, 2019 instructing the parties to file a joint letter by today proposing a deposition schedule for the Court to so-order, we write, on behalf of all parties, to propose the following deposition schedule:

September 26:	Defendant Todd Houslanger jointly in his individual capacity and as the corporate representative of Defendant Houslanger & Associates, PLLC
October 4:	Plaintiff Barbara Stinson
October 7:	Defendant Bryan C. Bryks
October 11:	Defendant Matthew Blake jointly in his individual capacity and as the corporate representative of DEMI, LLC
October 16:	Carry-over date (if necessary)

Plaintiff's deposition shall be held at the Law Office of Ahmad Keshavarz, 16 Court Street, 26th Floor, Brooklyn, NY. Defendants' depositions shall be held at Abrams Garfinkel Margolis Bergson, LLP, 1430 Broadway, 17th Floor, New York, New York. Defendants' depositions shall begin at 10:30am. Plaintiff's depositions shall begin at 10:00am.

The parties further respectfully request, pursuant to the Court's Individual Practices, Rule I.e, a 60-day extension of the deadlines set forth in the Civil Case Management Plan and Scheduling Order (the "CMO") [Docket No. 50], in order to afford sufficient time to complete discovery, including, but not limited to, post-deposition discovery and non-party discovery. The parties previously made one joint

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request for an extension of the CMO deadlines, which the Court denied [Docket No. 68].

Accordingly, the parties respectfully request that the Court so-order the following deadlines:

1. Completion of fact discovery from November 1, 2019 to January 10, 2020 (CMO ¶6.a);
2. Completion of expert discovery, including expert depositions, from December 31, 2019 to March 6, 2020 (CMO ¶7.a);
3. Plaintiff's expert disclosure from December 2, 2019, to February 7, 2020 (CMO ¶7.b); and
4. Defendants' expert disclosure from December 31, 2019 to March 6, 2020 (CMO ¶7.c).

Respectfully submitted,

/s

Andrew W. Gefell

cc: All counsel of record (by NYSECF)

Application GRANTED in part. The parties shall hold depositions on the schedule as proposed above.

The parties' request to extend the discovery deadlines is DENIED as premature. By **October 23, 2019**, the parties shall file a joint status letter. Any renewed request for an extension of the discovery deadlines in that letter must explain what specific additional discovery is needed and why the requested extension length is necessary. The parties shall make every effort, however, to complete discovery within the current discovery deadlines. The Clerk is directed to close ECF 100.

SO ORDERED.



Ona T. Wang
U.S. Magistrate Judge

9/13/19